

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VANESSA CHAVEZ,)	
KEITH DISMUKES, and)	
LATASHA TURNER,)	
individually and on behalf of a)	Case No. 12-cv-5563
class of persons similarly situated,)	
)	
Plaintiffs,)	Judge Joan B. Gottschall
)	
v.)	
)	Magistrate Judge Susan E. Cox
HAT WORLD, INC., a Minnesota)	
corporation,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF THE PARTIES' JOINT STIPULATION OF SETTLEMENT AND RELEASE**

Plaintiffs, Vanessa Chavez, Keith Dismukes, and Latasha Turner, individually and on behalf of a class of persons similarly situated, by their attorneys, respectfully move for the entry of an Order granting final approval of the Parties' Settlement Agreement and Release (the "Settlement Agreement"). In support of their motion, Plaintiffs submit a supporting Memorandum of Law, the Declarations of Class Counsel, and the Declaration of Kristin Dahl as authorized agent of the Claims Administrator, and state as follows:

1. On May 9, 2014, this Court granted preliminary approval of the settlement of the Plaintiffs' and the Class Members' claims (the "Settlement"). (Dkt. No. 128).
2. Final approval is appropriate where the court determines that a settlement is fair, adequate, and reasonable. *Synfuel Techs., Inc. v. DHL Express (USA), Inc.*, 463 F.3d 646, 652 (7th Cir. 2005).

3. The Settlement in this case was achieved in good faith and through arms-length negotiations, and is not the product of fraud or collusion.

4. The Settlement offers substantial monetary relief to the Class Members.

5. The Settlement is overwhelmingly supported by class members. None of the 1,559 Class Members submitted a request for exclusion or objected to the Settlement. These facts show strong support for the Settlement.

6. Plaintiff has provided the Class Members with adequate notice of the terms and conditions of the Settlement in a manner intended to maximize their due process rights.

7. Additionally, experienced Class Counsel have extensively analyzed the claims and issues herein, and certify that the Settlement is fair, reasonable, and adequate, and in the best interest of the Class Members. Thus, the Court should grant final approval of the Settlement, find the Settlement fair, reasonable, adequate, and in the best interests of the Class Members, approve Class Counsel's request for an award of attorneys' fees and costs, approve the Service Payments to the Class Representatives, and enter the proposed final approval order dismissing this action.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter the proposed Final Approval and Dismissal Order, attached as Exhibit 1 to Plaintiffs' Memorandum of Law.

Respectfully submitted,

VANESSA CHAVEZ, KEITH DISMUKES, and
LATASHA TURNER, individually and on behalf
of a certified class of persons similarly situated,

/s/ James X. Bormes
One of Plaintiffs' Attorneys

James X. Bormes
Catherine P. Sons
Law Office of James X. Bormes, P.C.
8 South Michigan Avenue
Suite 2600
Chicago, Illinois 60603
(312) 201-0575

Thomas M. Ryan
Law Office of Thomas M. Ryan, P.C.
35 E. Wacker Drive
Suite 650
Chicago, Illinois 60601
(312) 726-3400

Jeffrey Grant Brown
Jeffrey Grant Brown, P.C.
221 N. LaSalle Street
Suite 1414
Chicago, Illinois 60601
(312) 789-9700